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May 21, 1999

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, Counter TW-A325
Washington, D.C. 20554

RECEIVED

MAY 21 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte Notice*
Broadcast Television National Ownership Rules
Mass Media Docket No. 96-222

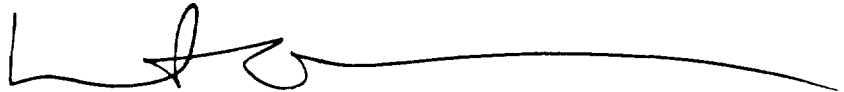
Dear Ms. Roman Salas:

This is to notify the Commission that on May 19, 1999, the undersigned and Jim Yager, president of Benedek Broadcasting Corporation ("Benedek"), discussed issues under consideration in the above-referenced docket with Commissioner Susan Ness; Anita Wallgren, Esq., legal advisor to Commissioner Ness; Helgi Walker, Esq., legal advisor to Commissioner Furchtgott-Roth; Marsha McBride, Esq., legal advisor to Commissioner Powell; Rick Chessen, Esq., legal advisor to Commissioner Tristani; Robert Ratcliffe, Esq., Deputy Chief of the Mass Media Bureau; and Charles Logan, Chief of the Policy and Rules Division of the Mass Media Bureau.

The purpose of the meeting was to explain Benedek's position on the issue of market definition for purposes of local television multiple ownership rules. Specifically, Benedek discussed its view that markets should be defined by DMAs without an additional Grade A overlap standard. These views are set out more fully in the attachment, which also includes a non-exhaustive list of the irrational results that would be created by including a Grade A overlap test in the definition of a television market.

Please direct any questions concerning this matter to the undersigned.

Very truly yours,



Kurt A. Wimmer

Enclosures

cc (w/enc.): The Hon. Susan Ness
Anita Wallgren, Esq.
Susan Fox, Esq.
Helgi Walker, Esq.

Marsha McBride, Esq.
Rick Chessen, Esq.
Charles Logan, Esq.
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List A B C D E

THE FCC SHOULD PERMIT COMMON OWNERSHIP OF TELEVISION STATIONS LOCATED IN DIFFERENT DMAS

The FCC currently is considering a proposal to prohibit common ownership unless the stations in question are in separate DMAs *and* have no Grade A contour overlap. This proposal is unnecessarily restrictive. The original purpose of the duopoly rule – fostering of diversity and competition – would be served just as well by prohibiting common ownership unless television stations are located in different DMAs.

- **A duopoly standard based on actual television viewership patterns is more rational than a standard based on engineering contours.** As the FCC has observed, the DMA definition "attempts to capture actual television viewership patterns." TV Ownership 2nd Further Notice, ¶ 15. Television stations in different DMAs serve different communities, with different advertisers, different local politics, different socio-economic profiles, different viewing interests, and different values. A duopoly standard ensuring that two stations in the same DMA (i.e., with the same viewership patterns) have independent ownership is adequate to safeguard robust competition for advertising dollars and to ensure a diversity of programming voices for every community. The simple fact of overlapping Grade A contours is a poor proxy for actual television viewership patterns.
- **The proposed Grade A standard would treat hundreds of stations in completely different markets as "in the same market" for ownership purposes.** Many stations have slightly overlapping Grade A contours but lie in different DMAs and serve wholly different markets. Informal spot-checking of markets likely to contain such stations has revealed that *at least 165 stations in 35 DMAs* (including seven of the top ten markets) have a Grade A overlap with at least one other station in a separate DMA. Under the proposed standard, these stations would be deemed "in the same market" and subject to the duopoly prohibition. Examples include:
 - *Four* stations in the Toledo, OH DMA overlap with at least one in the Detroit, MI DMA, and *seven* stations in the Detroit DMA overlap with at least one in the Toledo DMA;
 - *Four* stations in the Rockford, IL DMA overlap with at least one in the Madison, WI DMA, and *four* stations in the Madison DMA overlap with at least one in the Rockford DMA;
 - *Seven* stations in the Sacramento-Stockton, CA DMA overlap with at least one in the San Francisco-Oakland-San Jose, California DMA, and *thirteen* stations in the San Francisco-Oakland-San Jose DMA overlap with at least one in the Sacramento-Stockton DMA;
 - *Ten* stations in the New York, NY DMA overlap with at least one in the Hartford-New Haven, CT DMA, and *six* stations in the Hartford-New Haven DMA overlap with at least one in the New York DMA.

- *Eleven* stations in the Miami-Fort Lauderdale, FL DMA overlap with at least one station in the West Palm Beach, FL DMA, and *six* stations in the West Palm Beach DMA overlap with at least one in the Miami-Fort Lauderdale DMA.
- **The FCC's standard would effectively "discriminate" between stations in the same market, on the basis of transmitter location.** By putting emphasis on Grade A contours, rather than DMAs, the proposed standard would put an unfair premium on careful location of transmitters. In at least one major market, one broadcaster could own a station in an adjacent market while every other broadcaster in the market could not, merely because of fortuitous transmitter location. Moreover, it penalizes UHF broadcasters because UHF stations have *larger* Grade A contours than VHF stations – even though VHF stations, overall, have much larger service areas.
- **Liberalization of ownership rules is actually needed to protect smaller stations and ensure both diversity and localism.** It was once assumed that broadcast stations could flourish in spite of rigid separate ownership requirements. Television station revenue and audience shares have declined over the past two decades and are expected to fall further as viewing of other video outlets increases. This phenomenon is particularly troubling in smaller markets. As weaker stations go dark, diversity and localism suffer. Relaxation of ownership restrictions could save some of these stations by permitting them to reap the efficiency benefits of combined operation.
- **A duopoly standard leading to repeated administrative waivers is administratively inefficient.** The FCC repeatedly waived the old duopoly rule. Even since temporary adoption of this "Grade A" standard in 1996, the FCC has granted a number of waivers. Our review of these cases suggests that despite some Grade A overlap, typically waiver was driven by the existence of a large number of television stations and other media in the DMA, or a diversity of other media outlets, convincing staff that the rule was simply not in synch with reality. If a "DMA plus Grade A" rule were adopted without the potential for waiver, it would lead to arbitrary and capricious results in hundreds of cases (see attached). The Commission would be much better served by a straightforward DMA-only rule.

BENEDEK BROADCASTING CORPORATION

GRADE A OVERLAPS

Key: Every station in the DMA on the left overlaps with at least one station in its neighboring DMA (on the right); every station in the DMA on the right overlaps with at least one station in its neighboring DMA (on the left). Stations marked with an asterisk (*) have large Grade A contours and frequently overlap with more than one station in the neighboring DMA. Source: Television & Cable Factbook (1999).

Toledo, OH DMA (66)	Detroit, MI DMA (9)
A-902 WNWO-TV	A-579 WADL
A-903 WTOL-TV*	A-580 WDIV*
A-904 WTVG*	A-581 WDWB*
A-905 WUPW	A-582 WJBK*
	A-583 WKBD-TV*
	A-584 WWJ-TV*
	A-585 WXYZ-TV*

Sacramento-Stockton, CA DMA (20)	San Francisco-Oakland-San Jose, CA DMA (5)
A-151 KCRA-TV*	A-171 KBHK-TV*
A-152 KFTL*	A-172 KBWB*
A-153 KMAX-TV*	A-173 KCNS*
A-154 KOVR*	A-174 KDTV*
A-155 KQCA*	A-176 KGO-TV*
A-156 KSPX	A-177 KPIX-TV*
A-157 KTXL*	A-178 KRON-TV*
A-158 KUVS	A-179 KTSF*
A-159 KXTV*	A-180 KTVU*
	A-181 KICU-TV*
	A-182 KKPX*
	A-183 KNTV*
	A-184 KSTS

New York, NY DMA (1)	Hartford-New Haven, CT DMA (27)
A-787 WABC-TV*	A-218 WFSB*
A-788 WCBS-TV*	A-219 WHCT-TV
A-789 WNBC*	A-220 WTIC-TV*
A-790 WNYW*	A-221 WTNH-TV*
A-791 WPIX*	A-222 WVIT*
A-792 WPXN-TV*	A-223 WBNE*
A-793 WHSE-TV*	A-224 WHPX
A-794 WNJU*	A-225 WTXX*
A-795 WWOR-TV*	
A-796 WXTV*	
A-217 WBPT*	

Rockford, IL DMA (134)	Madison, WI DMA (84)
A-406 WIFR*	A-1281 WISC-TV*
A-407 WQRF-TV*	A-1282 WKOW-TV*
A-408 WREX-TV*	A-1283 WMSN-TV*
A-409 WTOO*	A-1284 WMTV*

Miami-Fort Lauderdale, FL DMA (16)	West Palm Beach-Fort Pierce, FL DMA (44)
A-253 WAMI-TV*	A-300 WFGC
A-254 WBFS-TV*	A-301 WFLX*
A-255 WBZL*	A-302 WPBF
A-256 WFOR-TV*	A-303 WPEC*
A-257 WHFT*	A-304 WPTV*
A-258 WLTW*	A-305 WTVX
A-259 WPLG*	
A-260 WPXM	
A-261 WSCV*	
A-262 WSVN*	
A-263 WTVJ	

Washington, DC DMA (8)	Baltimore, MD DMA (24)
A-229 WBDC-TV*	A-543 WBAL-TV*
A-230 WDCA*	A-544 WBFF*
A-231 WJLA-TV*	A-545 WJZ-TV*
A-232 WRC-TV*	A-546 WMAR-TV*
A-233 WTTG*	A-547 WNUV*
A-234 WUSA*	A-548 WUTB*

Hartford-New Haven, CT DMA (27)	Providence, RI-New Bedford, MA DMA (50)
A-218 WFSB*	A-999 WJAR*
A-219 WHCT-TV	A-1000 WLNE-TV
A-220 WTIC-TV*	A-1002 WNAC-TV*
A-221 WTNH-TV*	A-1003 WPRI-TV*
A-222 WVIT*	
A-223 WBNE*	
A-224 WHPX	
A-225 WTXN*	

Denver, CO DMA (18)	Colorado Springs-Pueblo, CO DMA (94)
A-198 KCEC*	A-194 KKTU*
A-199 KCNC-TV*	A-195 KOAA-TV*
A-200 KDVR*	A-196 KRDO-TV*
A-201 KMGH-TV*	A-197 KXRM-TV*
A-202 KPXC-TV*	
A-203 KTVD*	
A-204 KUSA-TV*	
A-205 KWGN-TV*	

Philadelphia, PA DMA (4)	Baltimore, MD DMA (24)
A-227 WPPX (Wilmington, DE)*	A-543 WBAL-TV*
	A-544 WBFF*
	A-545 WJZ-TV*
	A-546 WMAR-TV*
	A-547 WNUV*
	A-548 WUTB*

Peoria-Bloomington, IL DMA (110)	Champaign & Springfield-Decatur, IL DMA (82)
A-379 WYZZ-TV*	A-380 WCIA*
	A-381 WICD*

Atlanta, GA DMA (10)	Chattanooga, TN DMA (87)
A-338 WPPA*	A-1045 WDEF-TV*
	A-1046 WDSI-TV*
	A-1047 WRCB-TV*
	A-1048 WTVC*
	A-1049 WFLI-TV*

Phoenix, AZ DMA (17)	Las Vegas, NV DMA (56)
A-65 KMOH-TV*	A-724 KFBT
	A-725 KINC
	A-726 KLAS-TV*
	A-727 KTNV
	A-728 KVBC
	A-729 KVVU-TV*

Phoenix, AZ DMA (17)	Tucson, AZ DMA (78)
A-70 KPNX	A-79 KOLD-TV

Los Angeles, CA DMA (2)	San Diego, CA DMA (26)
A-140 KSCI	A-168 KUSI-TV A-170 XEWT-TV

Monterey-Salinas, CA DMA (119)	San Francisco, CA DMA (5)
A-162 KSBW A-163 KSMS-TV	A-171 KBHK-TV A-172 KBWB A-173 KCNS A-174 KDTV A-176 KGO-TV A-178 KRON-TV A-179 KTSF A-180 KTVU A-181 KICU-TV A-182 KKPX A-183 KNTV A-184 KSTS

Eureka, CA DMA (191)	Chico-Redding, CA DMA (132)
A-106 KAEF	A-150 KRCR-TV

Denver, CO DMA (18)	Grand Junction-Montrose, CO DMA (188)
A-208 KREG-TV	A-209 KJCT-TV A-210 KKCO

Gainesville, FL DMA (165)	Orlando-Daytona Beach-Melbourne, FL DMA (22)
A-243 WCJB A-244 WGFL	A-245 WOGX

Panama City, FL DMA (157)	Tallahassee-Thomasville, FL DMA (114)
A-277 WMBB	A-285 WCTV

Augusta, GA DMA (111)	Columbia, SC DMA (86)
A-319 WAGT	A-1011 WACH A-1012 WIS A-1013 WLTX A-1014 WOLO-TV

Fort Myers-Naples, FL DMA (83)	Tampa-St. Petersburg-Sarasota, FL DMA (14)
A-237 WBBH-TV A-238 WFTX A-239 WINK-TV	A-288 WBHS-TV A-289 WBSV-TV A-290 WCLF A-291 WFLA-TV A-292 WFTS-TV A-295 WTTA A-296 WTVT A-297 WWSB A-298 WWWB A-299 WXPX

Albany, GA DMA (148)	Tallahassee-Thomasville, FL DMA (114)
A-309 WALB-TV A-310 WFXL	A-323 WTLH A-343 WGVP

Columbus, GA DMA (128)	Macon, GA DMA (122)
A-327 WRBL	A-334 WMAZ-TV

Phoenix, AZ DMA (17)	Tucson, AZ DMA (78)
A-70 KPNX	A-79 KOLD-TV

Dayton, OH DMA (54)	Cincinnati, OH DMA (32)
A-436 WKOI	A-875 WCPO-TV A-876 WKRC-TV A-877 WWLT A-878WSTR-TV A-879 WXIX-TV

Indianapolis, IN DMA (25)	Terre Haute, IN DMA (139)
A-425 WCLJ A-427 WIPX	A-442 WBAK-TV A-443 WTHI-TV A-444 WTOO

Des Moines, IA DMA (70)	Cedar Rapids-Waterloo-Dubuque, IA DMA (88)
A-455 KCCI A-457 WHO-TV	A-448 KCRG-TV A-449 KFXA A-452 KWWL

Rochester, MN-Mason City, IA-Austin, MN DMA (153)	Cedar Rapids-Waterloo-Dubuque, IA DMA (88)
A-460 KIMT	A-448 KCRG-TV

Ottumwa, IA-Kirksville, MO DMA (198)	Cedar Rapids-Waterloo-Dubuque, IA DMA (88)
A-462 KYOU-TV	A-448 KCRG-TV

Kansas City, MO DMA (33)	Topeka, KS DMA (140)
A-474 KMC A-662 WCTV A-663 KCWE A-664 KMBC-TV A-665 KPXE A-666 KSHB-TV A-667 KSMO-TV A-668 KDAF-TV	A-477 KSNT A-478 KTKA-TV A-479 WIBW-TV

Panama City, FL DMA (157)	Dothan, AL DMA (172)
A-276 WJHG-TV A-277 WMBB A-279 WPGX	A-27 WTVY

Huntsville-Decatur-Florence, AL DMA (81)	Birmingham, AL DMA (39)
A-32 WAAY-TV A-33 WAFF A-34 WHNT-TV A-35 WZDX	A-30 WPXH (Gadsen, AL) A-31 WTJP (Gadsen, AL)

Mobile, AL-Pensacola, FL DMA (62)	Biloxi-Gulfport, MS DMA (158)
A-36 WALA-TV A-37 WKRG-TV A-39 WPMI	A-633 WLOX-TV

Columbus, OH DMA (131)	Birmingham, AL DMA (39)
A-634 WCBI-TV	A-47 WCFT-TV (Tuscaloosa, AL)

Lexington, KY DMA (67)	Tri-Cities (Bristol, VA-Kingsport-Johnson City, TN) DMA (92)
A-491 WYMT-TV (Hazard, KY)	A-1203 WCYB-TV A-1204 WLFG

Bowling Green, KY DMA (182)	Nashville, TN DMA (30)
A-487 WBKO	A-1071 WKRN-TV A-1073 WSMV A-1075 WUXP A-1076 WZTV

Louisville, KY DMA (48)	Bowling Green, KY DMA (182)
A-489 WGRB (Campbellsville, KY)	A-4878 WBKO

Louisville, KY DMA (48)	Lexington, KY DMA (67)
A-489 WGRB (Campbellsville, KY)	A-490 WDKY-TV

Lafayette, LA DMA (123)	Alexandria, LA DMA (173)
A-511 KADN A-512 KATC A-513 KLFY-TV	A-505 KALB-TV

Baton Rouge, LA DMA (98)	Lafayette, LA DMA (123)
A-507 WAFB A-508 WBRZ A-509 WGMB A-510 WLVA A-511 KADN	A-511 KADN A-512 KATC A-513 KLFY-TV

Lafayette, LA DMA (123)	Lake Charles, LA DMA (179)
A-511 KADN A-512 KATC A-513 KLFY-TV	A-514 KPLC-TV

Alexandria, LA DMA (173)	Lake Charles, LA DMA (179)
A-505 KALB-TV	A-514 KPLC-TV

Monroe-El Dorado, LA DMA (133)	Alexandria, LA DMA (173)
A-516 KARD A-518 KNOE-TV	A-506 KLAX-TV

New Orleans, LA DMA (41)	Biloxi-Gulfport, LA DMA (158)
A-532 WUPL (Slidell, LA)	A-633 WLDX-TV

Shreveport, LA DMA (75)	Tyler-Longview, TX DMA (107)
A-527 KMSS-TV	A-1172 KETK-TV
A-529 KSLA-TV	A-1173 KFXK
A-530 KTAL-TV	A-1174 KLTW
A-531 KTBS-TV	

Portland-Auburn, ME DMA (80)	Burlington, VT-Plattsburgh, NY DMA (91)
A-537 WMTW-TV (Poland Spring, ME)	A-1196 WCAX-TV
	A-1197 WFFF-TV
	A-1198 WVMY

Baltimore, MD DMA (24)	Harrisburg-Lancaster-Lebanon-York, MD DMA (40)
A-543 WBAL-TV	A-973 WGAL
A-544 WBFF	
A-545 WJZ-TV	
A-546 WMAR-TV	
A-547 WNUV	
A-548 WUTB	

Boston, MA DMA (6)	Providence, RI-New Bedford, MA DMA (50)
A-555 WABU	A-999 WJAR
A-556 WBZ-TV	A-1000 WLNE-TV
A-557 WCVB-TV	A-1001 WNAC-TV
A-558 WFXT	A-1002 WPRI-TV
A-559 WHDH-TV	
A-560 WLVI-TV	
A-561 WSBK-TV	
A-562 WMFP	
A-563 WHSH-TV (Marlborough, MA)	
A-564 WBPX (Norwell, MA)	
A-568 WUNI (Worcester, MA)	

Hartford-New Haven, CT DMA (27)	Springfield-Holyoke, MA DMA (104)
A-218 WFSB	A-565 WGGB-TV
A-219 WHCT-TV	A-566 WWLP
A-220 WTIC-TV	
A-221 WTNH-TV	
A-222 WVIT	

Detroit, MI DMA (9)	Lansing, MI DMA (106)
A-572 WPXD (Ann Arbor, MI) A-580 WDIV A-581 WDWB A-582 WJBK A-583 WKBD-TV A-584 WWJ-TV A-585 WXYZ-TV	A-596 WILX-TV A-597 WLAJ A-598 WLNS-TV A-599 WSYM-TV

Detroit, MI DMA (9)	Grand Rapids-Kalamazoo-Battle Creek, MI DMA (38)
A-572 WPXD (Ann Arbor, MI) A-580 WDIV A-581 WDWB A-582 WJBK A-583 WKBD-TV A-584 WWJ-TV A-585 WXYZ-TV	A-573 WZPX

Grand Rapids-Kalamazoo-Battle Creek, MI DMA (38)	Lansing, MI DMA (106)
A-573 WZPX A-589 WOOD-TV A-590 WOTV A-591 WWMT A-592 WXMI A-595 WLLA	A-596 WILX-TV A-597 WLAJ A-598 WLNS-TV A-599 WSYM-TV

Rochester, MN-Mason City, IA-Austin, MN DMA (153)	Mankato, MN DMA (187)
A-612 KAAL	A-618 KEYC-TV

Biloxi-Gulfport, MS DMA (158)	Hattiesburg-Laurel, MS DMA (167)
A-633 WLOX-TV A-637 WXXV	A-638 WHLT

Greenwood-Greenville, MS DMA (181)	Jackson, MS DMA (89)
A-636 WABG-TV	A-641 WDBD A-642 WJTV A-643 WLBT-TV

Greenwood-Greenville, MS DMA (181)	Columbus-Tupelo-West Point, MS DMA (131)
A-636 WABG-TV	A-649 WLOV-TV A-650 WTVA

Paducah, KY-Cape Girardeau, MO-Harrisburg-Mount Vernon, IL DMA (76)	Jonesboro, AR DMA (178)
A-669 KPOB-TV (Poplar Bluff, MO)	A-92 KAIT-TV

Great Falls, MT DMA (185)	Helena, MT DMA (207)
A-692 KFBB-TV A-693 KRTV A-694 KTGF	A-696 KTVH

Wilkes Barre-Scranton, PA DMA (51)	Binghamton, NY DMA (154)
A-991 WBRE-TV A-992 WNEP-TV A-993 WOLF-TV A-994 WQPX A-995 WYOU	A-774 WBNG-TV A-775 WICZ-TV A-776 WIVT

Buffalo, NY DMA (42)	Rochester, NY DMA (77)
A-777 WGRZ-TV A-778 WIVB-TV A-779 WKBW-TV A-780 WNYO-TV	A-800 WHEC-TV A-801 WOKR A-802 WROC-TV A-803 WUHF

Binghamton, NY DMA (154)	Elmira, NY DMA (171)
A-774 WBNG-TV A-775 WICZ-TV A-776 WIVT	A-783 WENY-TV A-784 WETM-TV

Syracuse, NY DMA (74)	Binghamton, NY DMA (154)
A-809 WSYT	A-774 WBNG-TV A-775 WICZ-TV A-776 WIVT

Raleigh-Durham, NC DMA (29)	Greensboro-High Point-Winston Salem, NC DMA (47)
A-840 WLFL A-841 WRAL-TV A-842 WRAZ A-843 WRDC A-844 WTVD A-845 WRPX	A-818 WGPX (Burlington, NC)

Charlotte, NC DMA (28)	Columbia, SC DMA (86)
A-819 WBTV A-820 WCCB A-821 WCNC-TV A-822 WSOC-TV A-823 WJZY (Belmont, NC)	A-1012 WIS

Raleigh-Durham, NC DMA (29)	Florence-Myrtle Beach, SC DMA (112)
A-824 WFPX (Fayetteville, NC)	A-1015 WBTV A-1016 WPDE-TV A-1017 WWMB

Raleigh-Durham, NC DMA (29)	Greenville-New Bern-Washington, NC DMA (105)
A-825 WKFT (Fayetteville, NC) A-826 WNCN (Goldsboro, NC)	A-833 WNCT-TV A-834 WYDO

Charlotte, NC DMA (28)	Greensboro-High Point-Winston Salem, NC DMA (47)
A-819 WBTV A-820 WCCB A-821 WCNC-TV A-822 WSOC-TV A-823 WJZY (Belmont, NC)	A-827 WFMY-TV A-828 WGHP A-831 WXII A-832 WXLV-TV

Greensboro-High Point-Winston Salem, NC DMA (47)	Roanoke-Lynchburg, NC DMA (68)
A-831 WXII A-832 WXLV-TV	A-1222 WDBJ A-1223 WFXR-TV A-1224 WPXR A-1225 WSLS-TV

Cleveland, OH DMA (13)	Youngstown, OH DMA (97)
A-871 WVPX (Akron, OH)	A-906 WFMJ-TV
A-872 WDLI (Canton, OH)	A-907 WKBN-TV
A-873 WOAC (Canton, OH)	A-908 WYTV
A-880 WBNX-TV (Akron, OH)	
A-881 WEWS-TV	
A-882 WJW	
A-883 WKYC-TV	
A-884 WQHS-TV	
A-885 WOIO (Shaker Heights, OH)	
A-886 WUAB (Lorain, OH)	

Columbus, OH DMA (34)	Dayton, OH DMA (54)
A-874 WWHO (Chillicothe, OH)	A-891 WDTN
A-887 WBNS-TV	A-892 WHIO-TV
	A-893 WKEF
	A-894 WRGT-TV

Cincinnati, OH DMA (32)	Columbus, OH DMA (34)
A-874 WWHO (Chillicothe, OH)	A-875 WCPO-TV

Cleveland, OH DMA (13)	Columbus, OH DMA (34)
A-897 WMFD-TV (Mansfield, OH)	A-887 WBNS-TV
	A-890 WTTE